

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

Jeffrey E. Jenkins, Esquire

Jenkins & Clayman

412 White Horse Pike

Audubon, NJ 08106

(856) 546-9696

Attorney for Debtor

In Re:

Maureen Falls,
debtor

Case No.: 17-17906

Judge: JNP

Chapter: 13

CHAPTER 13 DEBTOR'S CERTIFICATION IN OPPOSITION TO

CREDITOR'S MOTION or CERTIFICATION OF DEFAULT

TRUSTEE'S MOTION or CERTIFICATION OF DEFAULT

The debtor in the above-captioned Chapter 13 proceeding hereby objects to the following (**choose one**):

1. Motion for Relief from the Automatic Stay filed by

MTGLO Investors, LP, creditor.

A hearing has been scheduled for October 3, 2017 AT 10:00 A.M.

OR

- Motion to Dismiss filed by the Standing Chapter 13 Trustee, _____.

A hearing has been scheduled for _____, at ____.

- Certification of Default filed by _____, creditor

I am requesting a hearing be scheduled in this matter.

OR

- Certification of Default filed by Standing Chapter 13 Trustee.

I am requesting a hearing be scheduled in this matter.

2. I am objecting to the above for the following reasons (**choose one**):

- Payments have been made in the amount of \$ _____, but have not been accounted for. Documentation in support of attached hereto.
- Payments have not been made for the following reasons and debtor proposes repayment as follows **explain your answer**): In my Chapter 13 case, my mortgage company filed a motion to vacate the stay. I thought I had made all payments. I have attached to this objection a copy of check number 886 in the amount of \$2,000.00 made payable to my mortgage company which was forwarded on August 28, 2017. I have also given my attorneys a cashier's check in the amount of \$6,000.00 payable to the mortgage company. Accordingly, I ask that the motion be denied.

Other (**explain your answer**): _____

3. This Certification is being made in an effort to resolve the issues raised by the creditor in this motion.
4. I certify under penalty of perjury that the foregoing is true and correct.

Date: 9.18.17

/s/ Maureen Falls
Maureen Falls, debtor

NOTE:

1. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor at least seven (7) days before the return date pursuant to D.N.J. LBR 9013-1(d), if filed in opposition to a *Motion for Relief from the Automatic Stay or Trustee's Motion to Dismiss*.
2. This form must be filed with the court and served upon the Standing Chapter 13 Trustee and creditor within ten (10) days of the filing of a *Creditor's Certification of Default* (under an *Order Resolving Motion to Vacate Stay and/or Dismiss with Conditions*) or a *Trustee's Certification of Default*.

If this form is not filed the Motion or Certification of Default will be deemed uncontested

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Other (**explain your answer**): _____

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Date: 9.18.17

/s/ Maureen Falls
Maureen Falls, debtor

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